Lower Passaic River Study Area

PRP DISCHARGE CASES FOR THE LOWER PASSAIC RIVER STUDY AREA

INVESTIGATION OF THE FOUNDRY STREET COMPLEX PRPS NEWARK, NEW JERSEY

NORPAK CORPORATION

PREPARED FOR:
LOWER PASSAIC RIVER STUDY AREA
COOPERATING PARTIES GROUP

SUBMITTED TO:
USEPA REGION II

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Norpak Corporation

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NORPAK CORPORATION / KEM REALTY COMPANY / TORCO INVESTING COMPANY, INCORPORATED / A.A.C. TRANSITION INVESTMENT CORPORATION

CURRENT MAILING ADDRESS/CONTACT INFO:

Anthony Coraci, President
Norpak Corporation
70 Blanchard Street
Newark, NJ 07105
(FNA000052 at Tab 85, FMG000147 at Tab 7)

FACILITY ADDRESS:

Norpak Corporation
Block 5005 – Lot 4
96-126 Roanoke Avenue
Newark, NJ 07105
(FMG000147 at Tab 7)

FINANCIAL VIABILITY (annual revenue, # of employees):

Norpak Corporation ("Norpak") was reportedly incorporated in the State of Delaware as of April 3, 1976. The company is headed by Anthony Coraci, who serves as President and Treasurer, and by Vincent J. Coraci, who is reported to be Norpak's Chairman of the Board and Secretary.

Of note, Anthony Coraci plead guilty in April 1996 to charges of bribery of an IRS Agent. Online sources report that Anthony Coraci conspired to pay $12,000 to bribe an IRS Agent in return for approval of more than $1 million in "questionable" corporate tax return deductions. Those deductions centered on claims by the company for environmental expenses and maintenance charges. (FNA000064 at Tab 85)

Norpak has a present-day reported workforce of 70 employees. Limited financial information – (dated as of 1990 to 1991) – indicates that the company had sales ranging from $10- to $20 million at that time. (FNA000052 at Tab 85, FPA0000147)

DATES OF OPERATION (include info. on predecessors/successors if known):

Norpak is the successor to several owners of property, (specifically Block 5005 - Lot 4), located at the Foundry Street Site. Through its predecessors, Norpak has owned property at the Site from 1962 to present.

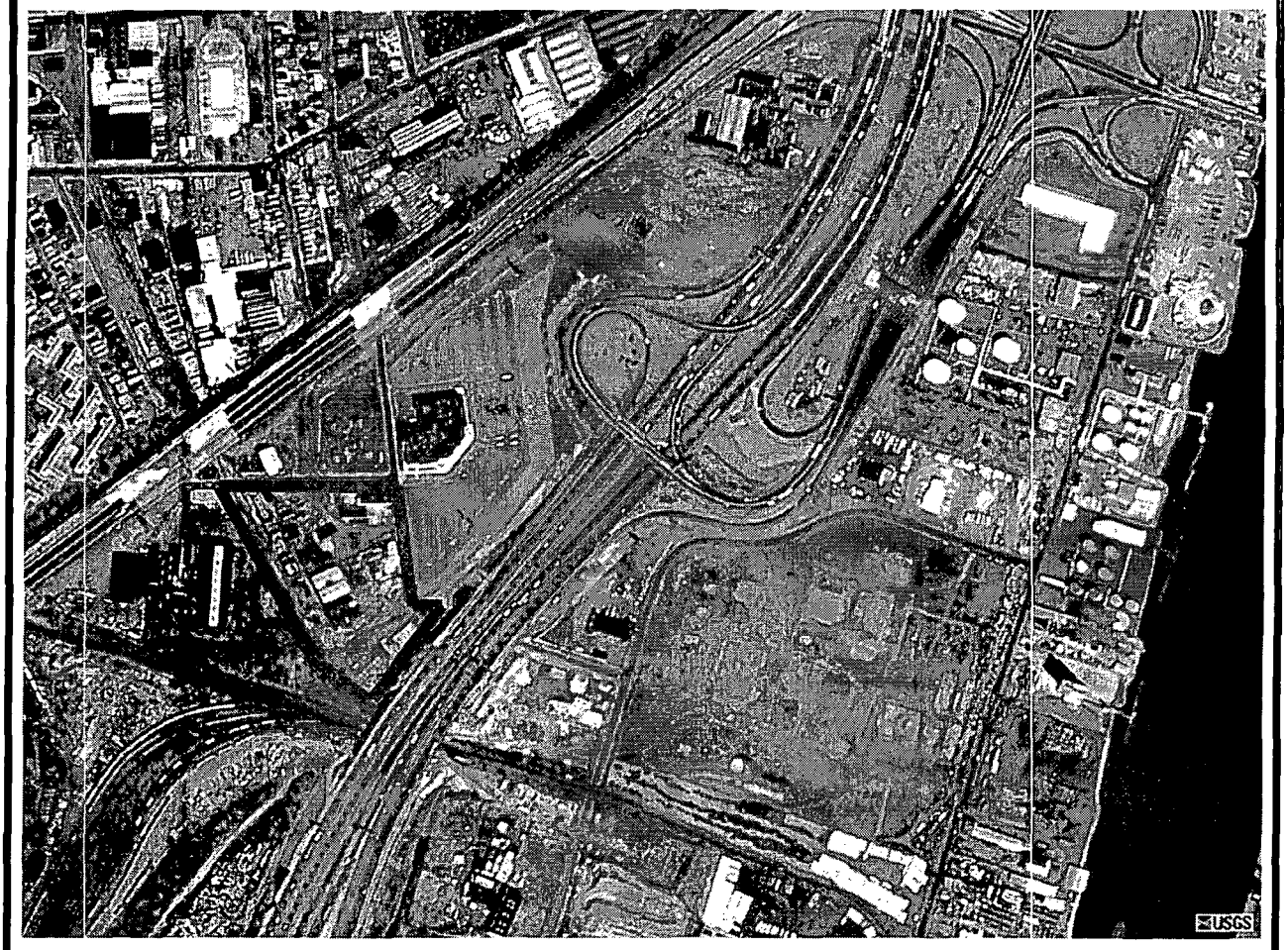
DESCRIPTION OF FACILITY OPERATIONS (list CERCLA hazardous substances used, manufactured or present):

The Foundry Street Complex ("Site") is bordered to its north by Roanoke Avenue and to its northeast and east by Foundry Street and Allegheny Avenue. The complex is bordered to its west and southwest by various railroad rights-of-way. The New Jersey Turnpike is located to the south of the complex. The Foundry Street Complex consists of approximately 6 different City of Newark tax parcels, including the following:

- Block 5005 – Lot 4
- Block 5005 – Lot 5
- Block 5005 – Lot 6
- Block 5005 – Lot 10
- Block 5005 – Lot 21
- Block 5005 – Lot 22

(FMG000117 at Tab 7, FMG000174 at Tab 7)

The following annotated aerial photograph identifies the approximate location of the Foundry Street Complex Site:



FOUNDRY STREET COMPLEX SITE

Aerial photograph dated March 29, 1995.
All annotated site outlines and locations are approximations.
Source: USGS / Terraserver-USA.com

Norpak has owned property at the Site from 1962 to present through the following predecessors and their respective time periods:

OWNER	TIME PERIOD	STATUS
Kem Realty Company	05/1962 – 04/1976	Merged into Torco Investing Company, Inc.
Torco Investing Company, Inc.	04/1976 - 11/1976	Transferred property to Norpak Corporation
Norpak Corporation	Unknown. Circa 11/1976	Merged into and transferred property to A.A.C. Transition Investment Corporation
A.A.C. Transition Investment Corporation	Unknown. Circa 11/1976 – 11/1981	Sold property back to Norpak Corporation

(FMG000119 at Tab 7, FMG000127 at Tab 7)

In May 1962, Kem Realty Company ("Kem Realty") purchased Block 5005 - Lot 4 of the Site from then-property owner Chemical Industries, Incorporated. Lot 4 was reportedly subdivided as of January 1964 into Lot 4, and a new smaller lot designated as Block 5005 - Lot 21. (FMG000119 at Tab 7)

As of April 1976, former Block 5005 - Lot 4 property owner Kem Realty was reported to merge with several companies, including the following :

- AAC Realty Company
- Core Realty Corporation
- D. S. C. of Newark
- Diamond Ink Company
- Newark Glassine Bag Company
- NJ Raw Materials, Inc.
- Norpak Corporation

(FMG000127 at Tab 7)

Kem Realty and the above-listed companies were reported by NJDEP to merge and form Torco Investing Company, Incorporated ("Torco Investing"). As of November 1976, Torco Investing was reported to transfer ownership of Block 5005 - Lot 4 to Norpak. Subsequent to that time, Norpak was reported to then merge with the following companies:

- Abar International Corporation
- Leeds Enterprises, Inc.
- Norpak Specialties Corporation

(FMG000127 at Tab 7)

The merger of Norpak and the above-listed companies resulted in a new company named A.A.C. Transition Investment Corporation ("A.A.C. Transition"). (FMG000127) It was reported by NJDEP that, as of November 1981, A.A.C. Transition sold and transferred ownership of Block 5005 - Lot 4 back to Norpak. (FMG000127 at Tab 7)

As noted above, ownership of Block 5005 - Lot 4 is known to have historically transferred from Kem Realty to Torco Investing, from Torco Investing to AAC Transition, and ultimately from AAC Transition back to present-day Norpak. (FMG000127 at Tab 7)

In its 1991 site investigation report, NJDEP documented that the following companies were known to have historically operated on Block 5005 - Lot 4 of the Site during its ownership by Norpak and its predecessors:

- ABC Demolition Company
- Avon Drum Company
- Berg Chemical
- Comstock Foods
- Conus Chemical
- Coronet Chemical Company
- County Lift Truck Service
- CWC Industries, Inc.
- Essex Chemical
- Grignard Chemical
- Honig Chemical
- Hummel Chemical
- Morrel Truck Service
- RFE Industries

(FMG000127 at Tab 7)

Avon Drum:

For a twenty-year time period between the 1970s and early-1990s, Avon Drum Company, Inc. ("Avon") operated a drum brokerage operation on the northern portion of Block 5005 - Lot 4, in the Norpak property. (FMG000160 at Tab 7, FNA000023 at Tab 80)

According to NJDEP, the agency's review of an aerial photograph of the Foundry Street Complex taken as of September 6, 1978 served to determine the following:

> *"...extensive drum storage along Roanoke Avenue where Avon Drum operates."*

(FMG000160 at Tab 7)

The agency also determined the following fact from its review of the aerial photograph:

> *"The area appears to be heavily stained."*

(FMG000160 at Tab 7)

In an August 30, 1993 letter to NJDEP from Porzio, Bromberg & Newman, as counsel for Norpak, it was stated that:

> *"The discharges appear to be ongoing at the site of Avon Drum's operations on Norpak's Foundry Street property. The discharges appear to be from leaking drums or from drums which have been emptied onto the ground."*

(FNA000023 at Tab 80)

It was noted that *"the company washes out drums on the premises."* (FMG000160 at Tab 7)

In the August 30, 1993 letter it was stated that *"Norpak is in the course of complying with an Administrative Consent Order ("ACO") which applies to this portion, among others, of the property referenced in No. 6 above."* The letter further stated that *"Norpak is terminating Avon Drum's tenancy and is conducting a Remedial Investigation pursuant to the ACO mentioned above."* (FNA000024 at Tab 80)

Conus Chemical and Berg Chemical:

From 1984 through 1989, Conus Chemical ("Conus") conducted a chemical repackaging and distribution operation in Buildings 4, 5 and 7 on the Norpak property at the Site.(FMG000128 at Tab 7, FMG000172 at Tab 7)

On April 16, 1987, both Conus and Norpak were reportedly issued Directives by NJDEP, Division of Hazardous Waste Management. NJDEP advised that hazardous substances were improperly stored in Building # 7. NJDEP observed that several of the drums had "discharged their contents." Both Conus and Norpak were directed by NJDEP to repack and properly segregate the drums. (FMG000128 at Tab 7)

In discussing the Conus operations, which were noted to have previously been conducted under the name Berg Chemical Company, NJDEP stated that *"The outside storage area lacked adequate spill prevention structures to prevent spillage from seeping into the ground."* (FMG000160 at Tab 7)

As of December 31, 1989, Conus was evicted from the property by Norpak for non-payment of rent. During a subsequent inspection, NJDEP observed and subsequently cited both Norpak and Conus for "*discharges of hazardous substances throughout the inside and outside of the facility.*" (FMG000128 at Tab 7, FNA000001 at Tab 76)

In February 1990, NJDEP referred the Norpak property to USEPA for a CERCLA removal action at the Conus facility. (FMG000128 at Tab 7, FNA000001 at Tab 76)

Raw, process or waste materials that have been stored, used, generated and/or discharged by Conus Chemical are known to include:

- Acids
- Alcohols
- Solvents
- Petroleum products
- Corrosives
- Reactives
- Flammables
- Cadmium
- Caustic sludge
- Chromium
- Copper
- Dark waste liquid
- Flammable resin
- Lead
- Nickel
- Waste liquids
- Waste solids
- Zinc

(FMG000128 at Tab 7, FMG000160 at Tab 7, FNA000015-16 at Tab 78)

Coronet Chemical:

Between 1983 and 1984, Coronet Chemical ("Coronet") operated in Building # 9 at the Norpak property. Coronet also subleased Building # 4 from Conus. Building # 4 was utilized by Coronet for storage of raw materials. (FMG000128-129 at Tab 7, FMG000172 at Tab 7) Coronet was reported to have manufactured metallic sodium dispersions and pigment concentrations used in the Teflon industry. Coronet's operations at the Norpak property included the reclaiming of naphthalene and ether through the settling and distillation of spent Teflon etching solutions.

(FMG000129 at Tab 7)

Raw, process or waste materials that have been stored, used, generated and/or discharged by Coronet are known to include:

- Aluminum
- Diethyleneglycoldimethylether
- Distillation column solids
- Ether
- Naphthalene
- Spill cleanup materials
- Still bottoms

During an onsite inspection of the Coronet operation, NJDEP observed a leaking drum of naphthalene. It was further observed that "*waste generated from the recovery process was disposed into a domestic dumpster on site.*" (FMG000129 at Tab 7)

Norpak Property Sampling and Contamination:

Sampling of sediment, soil and surface water at the entire Foundry Street Complex was conducted by NJDEP in October 1988, including at Block 5005 - Lot 4 wherein Norpak was the documented property owner. NJDEP reported that: "*High concentrations of volatile organic compounds, base neutral compounds, PCBs and metals were present in the soil, sediment, surface water and ground water samples.*" (FMG000135 at Tab 7)

According to NJDEP, the most commonly detected contaminants included the following:

- Aroclor 1248
- Arsenic
- Benzene
- Bis (2-ethylhexyl) phthalate
- Butyl benzyl phthalate
- Cadmium
- Chlorobenzene
- Chromium
- Copper
- Di-n-butyl phthalate
- Lead
- Mercury
- Naphthalene
- Nickel
- Pyrene
- Tetrachlorobenzene
- Toluene
- Trichloroethane
- Xylene
- Zinc

(FMG000135 at Tab 7)

Soil sampling of the Norpak property in general, and specifically of tenants Avon Drum, Conus and Coronet, served to identify contaminants known or believed to be associated with their operations on the Norpak property, including but not limited to:

- 1,2-Dichloroethene
- 2-Methanaphthalene
- Benzene
- Benzo(a)anthracene
- Benzoic acid
- Butyl benzyl phthalate
- Chlorobenzene
- Chloroform
- Di-n-butyl phthalate
- Ethylbenzene
- Flouranthene
- Flourene
- Fluoranthene
- Metals
- Methylene chloride
- PCBs
- PCBs
- Pesticides
- Phenanthrene
- Phenthane
- Pyrene
- Semivolatile organic compounds
- Tetrachloroethene

- Tetrachloroethylene
- Toluene
- Trichloroethylene
- Volatile organic compounds
- Xylene

(FMG000160-161 at Tab 7)

PERMITS (provide dates):

NPDES:

Information is not available at this time.

POTW (pretreatment):

Information is not available at this time.

NEXUS TO LOWER PASSAIC RIVER STUDY AREA (describe in detail; cite to supporting documentation; date or time period of disposal; list CERCLA hazardous substances; and volume, if known):

Direct (e.g. pipe, outfall, spill):

See discussion below concerning discharges from the Foundry Street Complex to the Roanoke Avenue combined sewer system; as well as the dry- and wet-weather bypassing of wastewater from the Roanoke Avenue CSO and the ultimate discharge of same to the Passaic River.

Sanitary Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

Information obtained to-date indicates that wastewater discharged from the Foundry Street Complex Site is carried via combined sewers which ultimately discharge to the Passaic River. Information on the area sewer lines can be found in a report prepared by Purcell Associates ("Purcell") on behalf of the City of Newark, entitled Pollution Abatement Plan, Newark, New Jersey, ("1975 Purcell Abatement Plan"), dated 1975. It is noted in the 1975 Purcell Abatement Plant that a 30-inch sewer is routed from west-to-east along Roanoke Avenue and the northern border of the Site. After the intersection of Roanoke Avenue and Foundry Street, at the northeast corner of the Site, this sewer line increases in size to 48 inches in diameter. The sewer line continues to travel from west-to-east, increasing to 54 inches, before it is shown as ultimately discharging to the Passaic River via a 60-inch diameter outfall. (FMG000049 at Tab 2)

During a November 1990 site inspection at the Foundry Street Complex by NJDEP, it was observed that a series of strip drains were located throughout the Site. The strip drains located in Norpak's property – Block 5005 - Lot 4 – are shown to be routed through the Foundry Street Complex and towards Roanoke Avenue to the north of the Site. NJDEP subsequently stated that

the industrial sewerline on Norpak's property is connected to a "city sewer" on Roanoke Avenue. (FMG000115 at Tab 6, FMG000157 at Tab 7)

PVSC reported that, as of February 6, 1970, a Judgment was entered in a Superior Court of New Jersey litigation action brought by PVSC against the City of Newark for pollution emanating into the Passaic River from certain Newark-owned sewers. Reportedly, Newark was ordered to abate and remove all pollution from certain sewers discharging to the river. As of August 1971, PVSC advised Newark of the continuing pollution emanating from these sewers, noting that "... *it was the Commissioner' opinion that a considerable portion of the pollution in the lower Passaic River can be attributed to the discharges from these Newark Storm Sewers.*" (FMG000219 at Tab 12)

Newark's efforts to abate pollution from the target sewers included, but were not limited to, work performed in November and December of 1971 to clean the Roanoke Avenue sewer line. In December 1971, an explosion occurred in the Roanoke sewer during preparations for a "TV inspection" of the sewer line. That work re-commenced in January 1972. (FMG000228-229 at Tab 12)

In a Supplemental Relief Action in the Superior Court of New Jersey that was brought and heard in February 1972, by PVSC against Newark, the Court ordered Newark to terminate all illegal connections and to halt all pollution by September 1973. At that time in February 1972, Newark proceeded with efforts to inspect, seal and/or repair certain target sewers. (FMG000220-221 at Tab 12)

Between June and August of 1972, reports were issued by Newark calling for the re-laying of approximately 1,200 feet of the Roanoke Avenue sewer line from Doremus Avenue (near the Passaic River) and west to Avenue P (near Foundry Street). (FMG000228-229 at Tab 12)

As of February 1974, Newark requested help from PVSC to address the halting of pollution from the Newark sewers. By 1975, Newark advised that certain work efforts to abate the sewer pollution had to be "put off" due to limited funds. (FMG000220-221 at Tab 12)

Of note, as of January 1975, the City of Newark was reported by PVSC to have received a National Pollution Discharge Elimination System ("NPDES") Permit from USEPA for certain outfalls to the Passaic River, including the "Roanoke Avenue storm sewer." The terms of Newark's January 1975 NPDES permit were reported by PVSC to include, but not be limited to: (1) a wet weather study and implementation of an approvable monitoring program; (2) an abatement study of certain overflows; and (3) an engineering report and schedule for the elimination of all discharges by Newark of untreated wastewater. (FMG000222 at Tab 12)

Subsequent to the issuance of the above 1972 reports that called for the re-laying of the sewer line, PVSC stated that no further abatement efforts centered on the Roanoke Avenue sewer, from 1972 through and including in 1976. (FMG000228-229 at Tab 12)

In September 1978, and subsequently revised in January 1979, Clinton Bogert Associates ("Clinton Bogert"), on behalf of the City of Newark, issued its study of sources of pollution discharging to the Passaic River from certain storm sewer and combined sewer outfalls ("CSO"s) in Newark. The Clinton Bogert report is entitled City of Newark, New Jersey, Feasibility Study, Pollution Abatement Program ("1979 FS/Pollution Abatement Report"), and included an investigation of the Roanoke Avenue combined sewer system and CSO. (FMG000001-FMG000003 at Tab 1)

In the 1979 FS/Pollution Abatement Report, it was noted that "polluted liquid wastes are being discharged into the lower Passaic River from four sewers owned by the City of Newark. These wastes include continuous discharges from the wet weather outfall of the Roanoke Avenue combined sewer..." The report went on to state that "a non-functioning regulator causes the dry weather discharge at Roanoke Avenue. (FMG000007 at Tab 1)

It was noted in the 1979 FS/Pollution Abatement Report that, due to construction of the New Jersey Turnpike, a combined sewer regulator mechanism, the Avenue P regulator, was constructed on the Roanoke Avenue combined sewer in 1951. The Avenue P regulator was located closer to the intersection of Avenue P and Roanoke Avenue, at a distance of approximately 1425 feet west of the intersection of Roanoke Avenue and Doremus Avenue. (FMG000010 at Tab 1, FMG000013 at Tab 1)

Reportedly, a former regulator mechanism, the old Roanoke Avenue regulator was located to the east of the Avenue P regulator, near the intersection of Roanoke Avenue and Doremus Avenue. With construction of the Avenue P regulator in 1951, the old Roanoke Avenue regulator was "sealed off and abandoned" at that time. (FMG000010 at Tab 1, FMG000013 at Tab 1)

The Avenue P regulator was designed to divert all dry weather flow into a then-new 24-inch sanitary sewer. It was reported by Clinton Bogert that the new 24-inch sewer was routed from the Avenue P regulator, ran west-to-east and parallel to the older Roanoke Avenue combined sewer, and was ultimately connected to an 18-inch interceptor sewer located at Doremus Avenue. (FMG000010 at Tab 1)

An 18-inch sanitary sewer in the northern section of Doremus Avenue was reportedly connected to the then-new 24-inch sanitary sewer coming from Roanoke Avenue. This 18-inch Doremus Avenue sanitary sewer was reported to then pass under the former 54-inch Roanoke Avenue sewer, thereby bypassing the former Roanoke regulator mechanism. (FMG000010 at Tab 1)

Sewage in the Doremus Avenue "interceptor" sewer is reported to then flow to a Wilson Avenue interceptor sewer into a PVSC interceptor sewer that flows directly to the PVSC wastewater treatment plant. With construction of the Avenue P regulator and the new 24-inch sanitary sewer in 1951, the former 54-inch Roanoke Avenue combined sewer located "downstream" of the

Avenue P regulator was converted into a wet weather outfall to the Passaic River. (FMG000010 at Tab 1) The former 54-inch Roanoke Avenue combined combined/wet weather sewer ultimately discharges via a 60-inch outfall to the Passaic River. (FMG000031 at Tab 1)

Of significance, Clinton Bogert went on to state in its 1979 FS/Pollution Abatement Report that:

> *"The Avenue "P" regulator is not functioning. Over two feet of dry, granular sediment blocks the regulator gate chamber and prevents flow between the diversion chamber and the Roanoke Avenue dry weather sewer. As a result, all flow in the Roanoke Avenue combined sewer enters the Passaic River through the Roanoke Avenue outfall."*

(FMG000011 at Tab 1)

Clinton Bogert went on to note in its 1979 FS/Pollution Abatement Report that:

> *The regulator mechanism is corroded and not functional. A wooden weir, provided in the diversion chamber, is intact. This weir does not cause the upstream pipe to surcharge above the crown in dry weather. It does reduce upstream flow velocity and causes sedimentation. About 0.5 feet of primarily granular sediment was found in the combined sewer above the regulator. This material accumulates in dry weather and the lighter fractions, probably including most organic pollutants, may be flushed toward the Passaic River during relatively small rainfall events.*

(FMG000011 at Tab 1)

PVSC weekly inspection reports from 1978 and 1979 document that the Roanoke Avenue CSO line continued to bypass and discharge to the Passaic River. Relative to tenants at the Foundry Street Site, specifically Sun Chemical and Arkansas Chemical, PVSC reported on October 27, 1978, that "*City of Newark diversion chamber malfunctioning allowing polluting materials to enter storm drain thence Passaic River.*" PVSC reported on November 30, 1978, that "*city in conjunction with PVSC Industrial Dept. making investigations of chemical plants in Foundry St. area, in effort to determine the source of pollution to storm sewer*" and again on December 11, 1978, that "*Chamber which is malfunctioning at Roanoke Ave. still not repaired*".

In discussing pollution emanating from several City of Newark storm and CSO sewers, PVSC reported on March 2, 1979, that "*No new efforts made to abate these long standing pollution violations – No action taken to repair malfunctioning chamber at Roanoke Ave.*" Relative to these same storm and CSO sewers, including the Roanoke sewer line, PVSC reported on July 16, 1979, that "*Special – nothing being done at this time to abate these pollutions,*" on October 19th that "*Samples taken continue to show signs of pollution*" and repeatedly on both November 30th and December 14, 1979, that "*Samples taken found to be polluting.*" As of December 28, 1979,

PVSC reported "*Pollution still continues at these areas – nothing being done by city to abate problem.*" (FMG000218 at Tab 12, FMG000232 at Tab 13, FMG000245 at Tab 14, FMG000256 at Tab 15, FMG000275 at Tab 16, FMG000292 at Tab 17, FMG000302 at Tab 18, FMG000317 at Tab 19, FMG000325 at Tab 20, FMG000334 at Tab 21)

As noted above, sampling of sediment, soil and surface water at the entire Foundry Street Complex was conducted by NJDEP in October 1988, including at Block 5005, Lot 4 wherein Norpak was the documented property owner. According to NJDEP, the most commonly detected contaminants included the following:

- Aroclor 1248
- Arsenic
- Benzene
- Bis (2-ethylhexyl) phthalate
- Butyl benzyl phthalate
- Cadmium
- Chlorobenzene
- Chromium
- Copper
- Di-n-butyl phthalate
- Lead
- Mercury
- Naphthalene
- Nickel
- Pyrene
- Tetrachlorobenzene
- Toluene
- Trichloroethane
- Xylene
- Zinc

(FMG000135 at Tab 7)

Storm Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

See above discussion concerning the combined sewer system in the area of the Foundry Street Complex, which is known to ultimately discharge to the Passaic River. As discussed above, a system of strip drains within the Site are known to be tied into this combined sewer system, allowing storm water and/or surface run-off to serve to transport contaminants to the drains and ultimately to the Passaic River.

Runoff:

See above discussion concerning the combined sewer system in the area of the Foundry Street Complex, which is known to ultimately discharge to the Passaic River. As discussed above, a system of strip drains within the Site are known to be tied into this combined sewer system, allowing storm water and/or surface run-off to serve to transport contaminants to the drains and ultimately to the Passaic River.

NJDEP reported that a tenant on the Norpak property, specifically Grignard Chemical, is known to have received PCB-contaminated transformer oils at its Foundry Street facility. PCBs have been detected in Site media. NJDEP reported that "commonly detected contaminants" at the Site include Aroclor 1248. (FMG000130 at Tab 7, FMG000135at Tab 7)

Soil sampling of the Norpak property in general, and specifically of tenants Avon Drum, Conus and Coronet, served to identify contaminants known or believed to be associated with their operations on the Norpak property, including but not limited to:

- 1,2-Dichloroethene
- 2-Methanaphthalene
- Benzene
- Benzo(a)anthracene
- Benzoic acid
- Butyl benzyl phthalate
- Chlorobenzene
- Chloroform
- Di-n-butyl phthalate
- Ethylbenzene
- Flouranthene
- Flourene
- Fluoranthene
- Metals
- Methylene chloride
- PCBs
- PCBs
- Pesticides
- Phenanthrene
- Phenthane
- Pyrene
- Semivolatile organic compounds
- Tetrachloroethene
- Tetrachloroethylene
- Toluene
- Trichloroethylene
- Volatile organic compounds
- Xylene

(FMG000160-161 at Tab 7)

Historical core samples taken of sediments in the Passaic River located in the vicinity of the Roanoke Avenue CSO have served to identify contaminants in those sediments that match raw, process and waste materials known to be associated with contaminants identified in tenant operations and contaminated environmental media at the Norpak property.

Groundwater:

Information is not available at this time.

POTENTIAL NEXUS TO LOWER PASSAIC RIVER STUDY AREA (describe in detail; cite to supporting documentation; list CERCLA hazardous substances; and volume, if known):

Direct (e.g. pipe, outfall, spill):

Information is not available at this time.

Sanitary Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

See above information on documented discharges to facility storm sewer/strip drains, and the routing of same to combined sewers known to have outfalls to the Passaic River.

Storm Sewer (provide name and location of CSO; details regarding CSO overflows and dates):

See above information on documented discharges to facility storm sewer/strip drains, and the routing of same to combined sewers known to have outfalls to the Passaic River.

Runoff:

Information is not available at this time.

Groundwater:

Information is not available at this time.